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March 22, 2022

VIA ECF

Hon. John P. Cronan, U.S.D.J.
U.S.D.C. for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

This request is granted. Defendant shall file its pre-motion letters by April 6, 2022. Plaintiff shall respond to the pre-motion letters by April 13, 2022.

SO ORDERED.
Date: March 24, 2022
New York, New York


JOHN P. CRONAN
United States District Judge

Re: *Yensy Contreras v. Anaheim Ducks Hockey Club, LLC*
Case No. 1:21-cv-09447-JPC

Dear Judge Cronan:

We represent defendant Anaheim Ducks Hockey Club, LLC (“Defendant”) in the above-referenced action. Pursuant to Rule 3(B) of Your Honor’s Individual Rules and Practices in Civil Cases, we write, with the consent of counsel for Plaintiff, to respectfully request an additional extension of time for Defendant to file its pre-motion letters regarding its (i) anticipated motion to compel arbitration, and (ii) motion to stay discovery pending a decision on the motion to compel arbitration, from March 23, 2022 to April 6, 2022. This is the second request to extend these deadlines.

Defendant seeks this extension because it needs additional time to analyze Plaintiff’s usage of the website at issue. Specifically, Plaintiff and Defendant have conferred about the information produced by Plaintiff concerning Plaintiff’s search history, and Plaintiff’s counsel is working with their client to determine if additional search history information exists. Once this additional information is provided by Plaintiff, Defendant will need additional time to locate relevant information on its end in connection with such search history.

Accordingly, Defendant respectfully requests that its deadline to file its pre-motion letters regarding its (i) anticipated motion to compel arbitration, and (ii) motion to stay discovery pending a decision on the motion to compel arbitration, be extended from March 23, 2022 to April 6, 2022, and that Plaintiff’s response deadline to such letters be extended from March 30, 2022 until April 13, 2022.

We thank Your Honor for Your consideration of the foregoing.

Respectfully submitted,

/s/ Sean J. Kirby
Sean J. Kirby

cc: All counsel of record via ECF